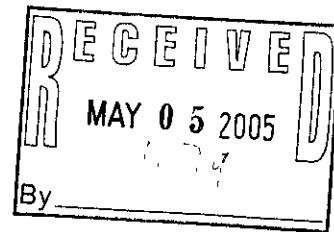




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April 28, 2005

Robert E. Feldman
Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429
Re: RIN 3064-AC89

Gentlemen:

The Alabama Multifamily Loan Consortium is a six-year old not-for-profit corporation that is involved in bringing private capital from Alabama banks together with public funding to provide new and renovated affordable housing to the working poor of this treacherously poor state. We could not have assisted in providing over 2,500 disadvantaged families and elderly residents with the safe and decent affordable housing that they deserve without regulatory enforcement of the Community Reinvestment Act. I find it critically important that all depository institutions (including credit unions, but that is an entirely different issue) continue to support such efforts and we find the recent actions of the Office of Thrift Supervision quite troubling at best, and downright unconscionable.

We appreciate the opportunity to comment on the joint interagency proposal by the FDIC, OCC and Federal Reserve Board to update CRA rules, principally by replacing the current three part Large Bank Lending, Investment and Services Test, with a new two part test for insured depository institutions between \$250 million and \$1 billion in assets, consisting of two separately weighted tests of equal weight: the Small Bank Lending Test and a new Community Development Test. We very much support this proposal, which actually encourages banks to lend, invest, and provide services to low- and moderate-income communities. In addition, we commend the three bank regulatory agencies for persistence and hard work in continuing to solicit and consider public comment, and issuing a balanced interagency proposal that constructively updates and modernizes the CRA regulations. But now is the time to prove that you are listening to those that care about the underserved.

As you well know, CRA is one of the least known but perhaps most remarkable success stories of domestic policy. CRA has fostered hundreds of partnerships between lenders and non-profit providers and local governments that have been instrumental in increasing homeownership, boosting economic development, and

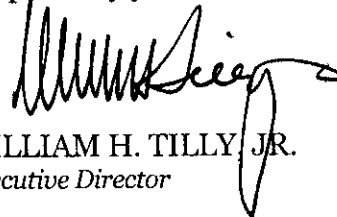
expanding small businesses, contributing to communities that are more vibrant. As government subsidies for affordable housing and community and economic development have diminished, the private capital provided by insured depository institutions has been critical to non-profit providers and local governments that try to leverage limited subsidy dollars.

We believe the flexible new Community Development Test will help overcome problems with the current Large Bank exam by providing insured depository institutions actual CRA credit for all community development activities, including loans and investments as well as services, thereby encouraging banks to undertake the complex, resource-intensive affordable housing and other community development loans that are critical in many low- and moderate-income communities.

We encourage you to invite the OTS to rescind its recent CRA rule changes, which are harmful to low- and moderate-income communities, and to join you in your responsive interagency proposal.

Finally, the principles underlying the Community Development Test would also increase regulatory incentives for institutions above \$1 billion in assets to undertake community development loans. We encourage you to update the rules for larger institutions as well.

Respectfully yours,

A handwritten signature in black ink, appearing to read "William H. Tilly, Jr.", with a stylized flourish at the end.

WILLIAM H. TILLY, JR.
Executive Director